

**California Water Plan Update 2018
December 2018 Draft
Los Angeles County Public Works Comments
January 21, 2019**

Los Angeles County Public Works appreciates this opportunity to provide comments on the State's Water Plan Update 2018. Public Works concurs with and supports the goals of the Water Plan and respectfully submits the following.

Infrastructure

The Update acknowledges that infrastructure is critical, and that much infrastructure is aging, has suffered from deferred maintenance, and is inadequate for today's needs. A significant factor contributing to "deferred maintenance" has been State and Federal regulations to protect the environment. Public works fully supports these regulations but points out that they also impose unintended mitigation requirements on routine maintenance of urban flood risk reduction, and water quality infrastructure.

We recommend the State strengthen the Water Plan requirement to collaborate with federal and local entities to amend State and federal regulations with the goal of exempting operation and maintenance of publicly owned urban flood risk reduction and water quality infrastructure from mitigation requirements. All operation and maintenance activities would be expected to fully comply with water quality regulations.

Sustainability

Like the San Joaquin Delta, the Los Angeles region experiences conflicts between water users, environmental advocates, and other local stakeholders. However, Los Angeles County has a hydrologic regime and population density that are very different from those of the Delta and Northern California Regions. The California Department of Fish and Wildlife is moving to impose flow bypass requirements on Los Angeles region water management entities for both the operation and implementation of stormwater capture and recycled water projects. We are concerned that CDFW's efforts will restrict the region's efforts to maximize local water supplies and become less dependent on water imported from Northern California and the Colorado River.

We recommend that the Water Plan require close collaboration with all State, Federal, and Local agencies during the development of habitat designations and recovery plans. We also recommend the same approach in developing State policies on flow bypass requirements

Ecosystem Restoration

The water Plan states that ecosystem restoration is vital to California's continued well-being and the County fully supports this position. Table 4-1 shows that the 50-year cost to "Restore Critical Ecosystem Functions" in California is over \$26 billion.

Public Works recommends the Water Plan recognize that ecosystem restoration goals in a highly urbanized region are different from those in a largely undeveloped region and, that to maximize the benefit of tax dollar investments, identification of specific ecosystem restoration areas should be closely integrated with regional water planning through a collaborative effort between State, Federal, and Local agencies. As a result, project mitigation investments could be better allocated and made where they will maximize regional restoration efforts.

Regulatory Challenges

The Water Plan mentions regulatory challenges to sustainable water management in California.

Implementing the integrated watershed and data management actions identified in the Water Plan will require increased staffing levels at State agencies to fully support these efforts. We recommend the Water Plan specifically address funding for the increased staff necessary to implement the Update.